Timeline Comparison between R5 and R10 1431 Petitions

	Armenia Growers Coalition (R5)	Lower Umatilla Basin Groundwater Management Area (R10)
Issue First Identified	**June 21-22, 2017**: EPA inspection of a large Concentrated Animal Feeding Operation in northeast Juneau County, Wisconsin--Central Sands Dairy, LLC. (EPA Sampling Inspection Report, April 30 - May 3, 2018)	**1990**: Lower Umatilla Basin (LUB) is declared a Groundwater Management Area (GWMA) because regional nitrate-nitrogen concentrations exceeded 7mg//L. The area includes parts of Morrow and Umatilla counties. A 4-year interagency hydrogeological investigation to determine the extent of the contamination and to identify potential sources begins.
Investigations by EPA, State, and Local Authorities	**October 23-25, 2017**: EPA sampled 13 private wells in northeast Juneau County. Sampling showed 6 wells had level of nitrates that exceeded the drinking water standard of 10 mg/L for Nitrates.	**June 1990 – March 1993**: State agencies collected nearly 850 groundwater samples from 252 sites in LUB, finding 30% contained nitrate concentration exceeding 10 mg/L and 44% were between 2 and 10 mg/L.
	April 30 - May 3, 2018: EPA conducted a groundwater investigation in Armenia Township in northeast Juneau County. The investigation studied pollutants in groundwater, collecting groundwater from 5 private wells. The study also revealed that the region is comprised largely of sandstone aquifers with sandy topsoil, creating significant ground water infiltration. The flow of groundwater within the study area is generally southeasterly in direction, towards Lake Petenwell. - EPA collected groundwater samples from 41 locations at two different depths (total of 82 samples). - Samples were analyzed for: nitrate, nutrients, organic carbon, anions, total dissolved solids, and total metals. (E. Coli was not tested.) - Many of the sites had nitrate levels that exceeded the MCL by 500%	**December 1997**: Lower Umatilla Basin Groundwater Management Area Action Plan is created, memorializing mitigation goals, recommendations, and strategies, but remained voluntary and provided no funding
	July 18, 2018: Over 100 citizens attend public informational meeting sponsored by Juneau County. A majority expressed interest in identifying the source of the contamination and expressed frustration that resources were not being provided for alternative water supplies, including treatment.	**January 2019**: Second Lower Umatilla Basin Groundwater Management Area Action Plan final draft for public comment is created, noting that 48% of 255 wells recently tested exceed 10 mg/L nitrate drinking water standard, and 60% exceeded the GWMA trigger level of 7 mg/L.

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Actions Taken to Address Issue	**Ex. 5 Deliberative Process (DP)**	
1431 Petitions	**September 26, 2018**: Petitioners send letter thanking EPA for the groundwater study and asking the agency to exercise its SDWA 1431 authority.	**January 16, 2020**: Food & Water Watch and 8 other petitioners ask EPA to take action pursuant to SDWA 1431 in response to nitrates in drinking water in the LUBGWMA (eastern Oregon), citing lack of progress since the GWMA began in 1990. Appendix of petition is 1,491 pages including reports, data, news articles and other complied relevant material.
	November 29, 2018: Region 5 responds to petitioners, informing them that EPA is working collaboratively with WDNR and Juneau and Wood Counties.	**January 29, 2020**: R10 RA provided initial response acknowledging receipt and indicating that EPA would respond further when we have completed our review.
Additional Actions	**December 18, 2018:** MOU entered into between WDNR, Wood and Johnson Counties, and AGC providing for alternative water, point of use treatment, an increased sampling area, and a two-year groundwater study	**February and March 2020:** Region 10 had discussions with multiple Oregon state agencies – those who are involved in the LUB GWMA - about information in the petition.